IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

LADARION HUGHES, et al.

Case No. 6:23-cv-344-JDK

Plaintiff

Judge Jeremy D. Kernodle

ν.

SMITH COUNTY, TEXAS

Defendant

NOTICE OF THE PARTIES RE: PROPOSED SCHEDULING ORDER

Pursuant to this Court's order (ECF 10), the parties met telephonically on October 24, 2023, to discuss a discovery schedule, and jointly submit the proposed scheduling order attached as **Exhibit 1**.

The parties' proposed scheduling order does not include a trial schedule because the trial date and corresponding pre-trial events will largely depend on when this Court rules on Plaintiffs' motion for class certification and any dispositive motion that the parties might file. The parties will, however, amend their proposed scheduling order to include a trial schedule if this Court so orders.

Date: October 25, 2023

Respectfully Submitted,

/s/

David Iglesias Lead Counsel State Bar No. 24051733 david@iglesiaslawfirm.com

Jim A. Evans III State Bar No. 24057717 State Bar No. 24053191 Texas Fair Defense Project Nathan Fennell Camilla Hsu 314 E. Highland Mall Blvd #204 Austin, TX 78752 nfennell@fairdefense.org chsu@fairdefense.org 512-637-5220

jim@iglesiaslawfirm.com

Stephanie Ernst State Bar No. 24057717 stephanie@iglesiaslawfirm.com

IGLESIAS LAW FIRM, PLLC

605 Chase Drive, Suite 8 Tyler, Texas 75701 Telephone: (903) 944-7185

Facsimile: (903) 630-5338

Counsel for Defendant, Smith County, Texas

/s/

Akeeb Dami Animashaun 355 S. Grand Ave, Suite 2450 Los Angeles, CA 90071 dami@animashaun.me 929-266-3971

Counsel for Plaintiffs & Proposed Class